

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA**

**IN RE MICHAEL G. RAYMER and
JOAN K. RAYMER,**

Debtors and Debtors in Possession,

)
) Bankruptcy Case No. 20-41378-BSK
)
) Chapter 12
)
) Hon. Brian S. Kruse
)
) **MOTION FOR THE EXTENSION OF DEADLINE**
)
)
)

Michael Ramer and Joan Raymer, debtors and debtors in possession in this Chapter 12 bankruptcy case (the “Debtors”), ask this court to enter an order extending, until January 22, 2021, the deadline for filing a plan of reorganization. In support of this motion, the Debtors make the following allegations.

1. The Debtors’ general reorganization counsel has recently changed the firm with which he practices.

2. During the transition between firms, the Debtors’ counsel has not had access to the files he maintained at his former firm. These files contained all the documents necessary for him to properly represent the Debtors.

3. The Debtors’ files have now been provided to their attorney, but he anticipates it will take him until January 22, 2021 to adequately review those files and prepare the Debtors’ plan.

4. No party in interest in this case will be prejudiced by the requested extension.

WHEREFORE, the Debtors ask this court to enter an order extending, until January 22, 2021, the deadline for filing a plan of reorganization. The Debtors ask for any additional or different relief this court deems appropriate.

/s/ Vincent R. Ledlow
Vincent R. Ledlow, Esq. Neb. Bar #27006

Ag & Business Legal Strategies
P.O. Box 11425

Cedar Rapids, Iowa 52410-1425

(515) 346-7171 (direct dial)

(319) 200-2059 (fax)

vincent@ablsonline.com

General reorganization counsel for Michael

G. Raymer and Joan K. Raymer,

Debtors and Debtors in Possession